

**Fill in this information to identify the case:**

Debtor 1 Brenda Lee Moller

Debtor 2 Michael Matthew Moller  
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of PA

Case number 18-10227 GLT

**Form 4100R**

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

**Name of Creditor:** U.S. Bank National Association, not in its individual capacity but solely in its capacity as Indenture Trustee of CIM Trust 2021-NR1 **Court claim no. (if known):** 11-2

**Last 4 digits** of any number you use to identify the debtor's account: 4764

**Property address:**  
1031 West 27Th Street  
Erie, PA 16508

**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 08 / 27 / 2023

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_

c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor(s) Brenda Lee Moller and Michael Matthew Moller  
First Name Middle Name Last Name

Case Number (if known): 18-10227 GLT

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box::*

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**\*s/Brian C. Nicholas (Atty ID: 317240)**

Date 06/08/2023

Brian Nicholas  
08 Jun 2023, 14:48:50, EDT

KML Law Group, P.C.  
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Philadelphia, PA 16106  
215-627-1322  
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Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Michael Matthew Moller  
Brenda Lee Moller**  
**Debtor(s)**

**U.S. Bank National Association, not in its  
individual capacity but solely in its  
capacity as Indenture Trustee of CIM  
Trust 2021-NR1**  
**Movant**  
**vs.**

**Michael Matthew Moller  
Brenda Lee Moller**  
**Debtor(s)**

**Ronda J. Winnecour,**  
**Trustee**

**BK NO. 18-10227 GLT**

**Chapter 13**

**Related to Claim No. 11-2**

**CERTIFICATE OF SERVICE  
RESPONSE TO NOTICE FO FINAL CURE MORTGAGE PAYMENT**

I, Brian C. Nicholas of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on June 8, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)  
Brenda Lee Moller  
1031 West 27th Street  
Erie, PA 16508

Michael Matthew Moller  
1031 West 27Th Street  
Erie, PA 16508-0000

Attorney for Debtor(s) (via ECF)  
Michael S. Jan Janin  
Quinn Buseck Leemhuis Toohey & Kroto Inc.  
2222 West Grandview Boulevard  
Erie, PA 16506-4508

Trustee (via ECF)  
Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

Method of Service: electronic means or first-class mail.

Dated: June 8, 2023

/s/ Brian C. Nicholas  
Brian C. Nicholas Esquire  
Attorney I.D. 42524  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
412-430-3594  
bkgroup@kmlawgroup.com